

PERMIT CHRONOLOGY

for

Geneva Steel**Iron Mountain****M/021/008**

(last revision - March 13, 1995)

February 12, 1990	Geneva submits LMO-NOI form, MR-REV form and narrative describing proposed changes.
October 17, 1990	DOGM site inspection.
October 24, 1990	DOGM's review letter sent.
December 27, 1990	Request for 1990 annual report.
January 14, 1991	Internal memo regarding unresolved transfer of UII property.
January 23, 1991	Annual report for 1990 received.
February 19, 1991	Internal memo regarding Division meeting January 18, 1991. Memo describes permit and bonding status for the various areas now under Geneva's control and recommends an updated permit.
February 22, 1991	Letter to Geneva describing permitting issues and requesting an interim surety. A time table for completion of the permit(s) is also requested.
March 6, 1991	Draft interim reclamation contract, draft self-bonding agreement and 1990 financial report submitted by Geneva.
March 7, 1991	Latest self bonding agreement and revised pages of Reclamation Contract faxed to Geneva.
March 11, 1991	Board package proposes interim surety and reclamation contract (received March 11, 1991) by April Board hearing.
March 14, 1991	Modified version of Reclamation Contract hand delivered.
March 21, 1991	Revised versions of Interim Reclamation Contract and Self Bonding Agreement received by Division.
April 9, 1991	Board package providing update on the interim form and amount of surety.
April 9, 1991	Letter from Geneva's legal counsel informing Division of planned attendance at April Board hearing.
April 9, 1991	Highlighted versions of revised Interim Reclamation and Self Bond received.
June 10, 1991	Board decision approves of interim surety amount for 12 month period. Surety is to be a combination of a self bond and another surety form.
July 26, 1991	Letter to Geneva describing Board decision.
August 4, 1991	Faxed bond and Reclamation Contract forms to Geneva.

August 30, 1991	Geneva response to July 26th letter. Geneva proposes a self bond and surety bond for interim surety.
September 13, 1991	Geneva submits revised pages for documents submitted August 30th.
September 16, 1991	Board package presenting interim surety for approval.
October 16, 1991	Letter to Geneva. On October 2, 1991, Board approved of interim surety. (Interim surety is to remain in place for 12 months).
October 21, 1991	Geneva letter requesting closure of old depository account (old surety) for Iron Mountain now that interim surety in place.
October 21, 1991	Division letter allowing closure of depository account.
December 10, 1991	Division letter approving transfer of UII permit to Geneva and release of surety.
January 13, 1992	Request for 1991 annual report.
February 3, 1992	Received 1991 report.
April 1, 1992	Geneva submits the first draft of the consolidated permit.
May 6, 1992	Geneva submits surety bond estimate and supporting data.
May 20, 1992	Letter from Geneva. Technical data submitted by Geneva for a final reclamation contract to supersede interim reclamation contract which runs until October 3, 1992.
October 20, 1992	Letter to Geneva granting first extension of Board deadline due to the Division's delay in reviewing the consolidated permit. The deadline is extended until April 2, 1993.
January 4, 1993	Request for 1992 report.
March 10, 1993	Received 1992 report.
March 15, 1993	Division review (12 page letter) of Geneva's first draft of the consolidated permit.
March 16, 1993	Fax of Division review letter sent to Geneva.
April 19, 1993	Meeting between Division and Geneva personnel to discuss the Division's review comments.
April 21, 1993	Letter from Geneva describing understandings, as a result of the meeting. The Division will request another extension to the interim contract and surety bond at the April 28, 1993 hearing.
April 22, 1993	Board package requesting time extension until December 31, 1993.
April 26, 1993	Faxed copy of Board package (request for extension) to Geneva.

April 26, 1993	Receive copy of Plan of Operations submitted to BLM by Geneva. Plan describes waste dumps located on unpatented mining claims.
April 28, 1993	Letter to Geneva. Board's second extension granted until December 31, 1993.
April 28, 1993	Letter from Geneva describing status of interim surety bond. Bond in effect until August 27, 1993 and will be renewed.
May 25, 1993	Letter to BLM. Division currently reviewing plan.
August 17, 1993	Faxed revision form to Geneva.
August 31, 1993	Received Geneva's second draft of the consolidated permit dated August 23, 1993.
December 13, 1993	Request for 1993 annual report.
December 22, 1993	Division review (18 page letter) of Geneva's second draft submission.
January 14, 1994	Received copy of BLM approval letter for Plan of Operation. Letter includes reclamation cost estimate for disturbances on BLM lands.
January 18, 1994	Meeting between Division and Geneva personnel to discuss the Division's December 22nd review letter.
January 20, 1994	Received letter from BLM correcting file number on previous letter.
January 25, 1994	Board memo describing status of permit review and requesting unspecified time extension for completion of the permitting process.
January 26, 1994	Board granted third extension of interim surety until end of calendar year, 1994.
February 2, 1994	DOGM letter to Geneva Steel informing of Board's extension until December 31, 1994. Also advised Geneva of need to have all remaining concerns resolved by October 1, 1994 to meet December hearing deadline.
February 2, 1994	Received 1993 annual report.
February 10, 1994	Second meeting between DOGM and Geneva personnel to complete discussions of the Division's December 22, 1993 review letter.
March 25, 1994	Division performed site inspection to clarify or resolve the related permitting issues.
May 5, 1994	Division and Board tour and inspection of Geneva's Iron Mountain mine property.
June 2, 1994	Faxed copy of memo for March 25, 1994 inspection.
August 3, 1994	Letter to Geneva describing status of consolidated permit application. Division suggests Geneva respond to the December 22, 1993 letter by August 26, 1994, in order to meet the December 31, 1994 deadline.

September 9, 1994 Received Geneva's response to Division's December 22, 1993 review letter. Response included a five page cover letter, new and revised drawings, revised text and a copy of the December 22, 1993 letter, with comments in the margins.

November 30, 1994 *Division telefaxes draft technical review comments on Geneva's September 9, 1994 revised submission. Draft Board memo also included. Hard copies were subsequently mailed by December 2nd.*

December 7, 1994 *Division provides the Board with an update of the permit approval status for the Iron Mtn. Mine. Geneva Steel and Division propose a revised time scheduled to work out resolution of remaining technical concerns. Anticipate seeking Board approval of amount and form of surety by the March 1995 Board hearing. The Board concurs and approves the time extension request.*

January 23, 1995 *Division receives Geneva's response to the November 30, 1994 technical review letter. Response is received a little later than anticipated. Response still does not satisfy all of the Division's questions and concerns. Most concerns are clarification related issues. Plan is almost complete, but may cause delay in reaching anticipated March 22, 1995 tentative approval date.*

March 6, 1995 *Division telefaxes and mails out technical review comments on Geneva's January 23, 1995 revised submission. Request a March 13, 1995 meeting, to work out a final response to remaining concerns and agree on a final amount and form of reclamation surety.*

March 13, 1995 *Conference call between DOGM and Geneva Steel representatives to discuss Division's March 6th review comments. Resolution of remaining concerns worked out and agreed to by both parties. Geneva to proceed with preparation of final revised plan application and final reclamation surety estimate. Anticipate having same to DOGM by the March Board hearing date. Geneva's legal counsel to proceed with preparation of appropriate reclamation surety documents. Probably not available until April hearing.*